

LAVERY & SIRKIS, ESQUIRES

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Attorney for the Debtor, Vickie L. O'Neill

IN RE:	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	
	:	CHAPTER 13 CASE NO. 17-31913/CMG
Vickie L. O'Neill ,	:	
	:	CERTIFICATION IN SUPPORT OF MOTION
	:	TO WITHDRAW AS COUNSEL
Debtor	:	
	:	
	:	HEARING DATE:

I, Joan Sirkis Warren, of full age, do hereby certify and say as follows:

1. I am the attorney for debtor in the above-captioned matter and as such am fully familiar with the facts and circumstances therein.
2. On or about October 30, 2017 I filed the above referenced chapter 13 for the debtor, Vickie O'Neill.
3. The fee that I charged was \$3500.00 with \$1400.00 being paid up front and the balance of \$2100.00 to be paid through the chapter 13 plan. The debtor was also responsible to pay the court filing fee of \$310.00.
4. Prior to filing, the debtor gave me a money order in the amount of \$900.00 and a check in the amount of \$810.00.
5. The check in the amount of \$810.00 was returned for insufficient funds. The debtor has never made good on the check.

6. The debtor repeatedly, verbally advised that she has mailed replacement funds to me.

This was untrue as months have passed and we have not received the replacement funds.

7. The lack of payment and the patent lack of candor and truthfulness of the debtor have put me at odds with the debtor.

Wherefore, it is respectfully requested that I be relieved as counsel in this case.

I certify that the foregoing statements made by are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

/s/ Joan Sirkis Warren  
Joan Sirkis Warren

Dated: 02/12/18